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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHAREE BUSHNELL,

Plaintiff,

vs.

NANCY A. BERRYHILL,

Acting Commissioner of
Social Security,

Defendant.

CIVIL NO. 5:17-cv-02718-EJD

STIPULATION & PROPOSED ORDER
FOR EXTENSION FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT

IT IS HEREBY STIPULATED by and between the parties that Defendant shall have an extension of time to November 9, 2017 to respond to Plaintiff's motion for summary judgment. This is Defendant's first request for an extension of time. Since Plaintiff's counsel filed her brief, Defendant's counsel has been working on discovery in an Equal Employment Opportunity Commission (EEOC) case and responding to an appeal of another EEOC case. Defendant's counsel will be out of the office for the first couple weeks of October and has several other district court briefs due in October and November.

1 This request is made in good faith with no intention to unduly delay the proceedings.

2 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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5 Respectfully submitted,

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7 Dated: October 5, 2017

/s/ Terry LaPorte, Esq. *

8 *(as authorized via email on October 5, 2017)

9 Terry LaPorte, Esq.

10 BRIAN J. STRETCH
United States Attorney

11 Dated: October 5, 2017

/s/ Chantal R. Jenkins

12 Chantal R. Jenkins

13 Special Assistant U.S. Attorney

14 Attorneys for Defendant

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16
17 ORDER

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 DATED: _____

20 _____
21 HON. EDWARD J. DAVILA
22 UNITED STATES DISTRICT JUDGE
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